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In re: : UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK VICINAGE

NIEVES L. LARA-DELGADO, :  
: Chapter 13

Debtor. : Case No. 19-14615 (RG)

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Hearing Date: TBD

**CERTIFICATION OF DEBTOR IN SUPPORT OF CONFIRMATION  
OF FIRST MODIFIED CHAPTER 13 PLAN**

Nieves L. Lara-Delgado certifies as follows:

1. I am the debtor in the above captioned Chapter 13 Case. I make this certification in support of confirmation of my First Modified Chapter 13 Plan.
2. I commenced the above-captioned case on March 7, 2019. By order dated June 20, 2019, this Court confirmed my Chapter 13 Plan (Docket No. 24). By order dated November 12, 2019, this court required that I increase the amount of my chapter 13 Plan payments to \$1,275.00 per month to provide for payment of compensation allowed to my counsel (Docket No. 31).
3. Thereafter, I was laid off from my job working as a teacher in New York City due to the COVID-19 pandemic. I am receiving unemployment compensation instead of my salary. Additionally, my family support income has been reduced.

4. I anticipate that I will resume my previous employment when the emergency public regulations are lifted and the local economy re-starts. I also continue to seek other employment but as an educator of young children, opportunities are very limited as a result of social distancing and remote learning protocols.

5. The pandemic's interference with my employment has caused me sudden and significant financial hardship. I have been unable to replace my salary from my prior employment. I cannot continue to maintain plan payments in the amount of \$1,275.00 per month until the economy re-starts and I am able to go back to my previous job or find alternative employment.

6. As the COVID-19 pandemic has strained my family's budget, I respectfully request the Court to confirm my Modified Chapter 13 Plan, which will reduce the amount of my plan payments and extend the plan's completion date as permitted under the CARES Act. Confirming the Modified Chapter 13 Plan that I have proposed will not reduce the total amount that I am required to contribute toward repayment of my prepetition debts. Confirming the Modified Chapter 13 Plan will reduce the possibility that the pandemic will force me to default on my plan payments.

7. As the COVID-19 pandemic is a barrier to my prompt resumption of work, I respectfully submit that I am directly suffering a "material financial hardship" as a result of the pandemic, and that the modification I seek is permitted under the CARES Act.

WHEREFORE, I respectfully request that this court confirm my Modified Chapter 13 Plan.

I certify that the foregoing statements are true. I am aware that if the foregoing statements are willfully false, I am subject to punishment.

Dated: 4/28/2020

/s/ Nieves L. Lara-Delgado

Nieves L. Lara-Delgado